

EXHIBIT 8



Kimberly Moin <kmoin@nklawllp.com>

Staten v. City of Philadelphia, et al.

Perry Wasserman <pwasserman@nklawllp.com>

Fri, Mar 28, 2025 at 4:21 PM

To: Stacey Mitchell <Stacey.Mitchell@rossfellercasey.com>

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Mr. Harden, Ms. Mitchell:

We intend to make a supplemental production on Monday.

On a separate matter, I again write to inquire about Plaintiff's responses to Defendant Officer McNesby's First Set of ROGs and Defendant City of Philadelphia's First Set of RFPDs, both of which were issued to Plaintiff on January 3, 2025. Mr. Harden confirmed receipt of these documents on January 3rd, and they were due by February 3rd.

A week after Plaintiff's responses were due, on February 10th, my paralegal emailed Mr. Harden to check on the status of the responses. On February 12th, Mr. Harden replied, "We should have them to you by Monday," which would have been February 17th. Receiving no responses by this date, my paralegal followed up with Mr. Harden again on February 18th. Mr. Harden replied that same day, "The responses will be provided by the end of the week."

We again received nothing from Plaintiff, so my paralegal followed up—for a third time—on February 25, 2025. Mr. Harden replied, "The delay is related to Mr. Staten's housing insecurity. He let us know that he had a box of documents from his time in prison but that he had to leave them with a friend when he was released as he did not have a stable place to stay. We do not know if those documents were destroyed or discarded by this 3rd party and multiple attempts to recover them have been unsuccessful. We will provide what we have for now, but wanted to make sure we turned over everything." I immediately responded to Mr. Harden's email, confirming we would accept production on a rolling basis.

It is now more than one month later, and we still have not received any responses from Plaintiff, which were due almost two months ago. **Please provide Plaintiff's responses to Defs' ROGs and RFPs no later than Tuesday, April 1st.** If we do not receive Plaintiff's responses by this date, we will seek the court's intervention in this matter. Thank you.

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